

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

Case No. 23-CV-24299 MORENO

MARIA ELENA CHAVEZ LETONA,

Plaintiff,

vs.

AMOR DE JESUS, CORP., SWEET LIVING
FACILITY INC., JOSE MACHADO, ZELMIRA
QUINONEZ AND AMINTA QUINONEZ

Defendants

**DEFENDANTS MOTION FOR EXTENSION
OF TIME TO FILE RESPONSE TO
PLAINTIFF'S STATEMENT OF MATERIAL FACTS**

COME NOW Defendants, by and through undersigned counsel and files this
Unopposed Motion for Extension of Time to file Response to Plaintiff's Statement of Material
Facts and as grounds therefore states as follows:

1. On or about June 27, 2024 Plaintiff filed her Statement of Material Facts.
2. Response to Plaintiff's Statement of Material Facts is due on or before July 7, 2024.
3. Undersigned counsel has requested the transcript of Plaintiff's Deposition and it will not arrive on time.
4. Undersigned is requesting a twenty (20) day extension in which to file a response to Plaintiff's Statement of Material Facts.
5. Pursuant to Local Rules, undersigned counsel has attempted to confer by emailing opposing counsel, Brian H. Pollock on July 2, 2024, and as of the filing of this motion no response has been received.
6. Plaintiff will not be prejudiced by the Defendants being granted an enlargement of time.

WHEREFORE, Defendants requests that this Honorable Court grant this unopposed motion for extension of time and whatever other relief it deems just and reasonable.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 5, 2024, I electronically filed the foregoing document with the Clerk of the Court using CM/EFC. I also certify that the foregoing document is being served this day on all counsel of record either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

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By: /s/ EMMANUEL PEREZ
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